

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

L.G., an individual; : Case No. 2:22-cv-01924  
: Plaintiff, : Judge: Algenon L. Marbley  
: v. : Magistrate: Elizabeth Preston Deavers  
: RED ROOF INNS, INC. AND :  
: RED ROOF FRANCHISING, :  
: LLC, : (Electronically Filed)  
: Defendants. :  
: :

**DEFENDANT, RED ROOF INNS, INC.’S ANSWER TO PLAINTIFF’S COMPLAINT**

Defendant, Red Roof Inns, Inc. (hereinafter “RRI”), by and through counsel, for its Answer to Plaintiff’s Complaint states as follows:

1. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1 of the Complaint and, therefore, denies the same.
2. RRI denies the allegations contained in paragraph 2 of the Complaint.
3. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 3 of the Complaint and, therefore, denies the same.
4. RRI denies the allegations contained in paragraph 4 of Plaintiff’s Complaint.
5. RRI denies the allegations contained in paragraph 5 of Plaintiff’s Complaint.
6. RRI denies the allegations contained in paragraph 6 of Plaintiff’s Complaint.
7. RRI denies the allegations contained in paragraph 7 of Plaintiff’s Complaint.

8. RRI denies the allegations contained in paragraph 8 of Plaintiff's Complaint.
9. RRI denies the allegations contained in paragraph 9 of Plaintiff's Complaint.

### **PARTIES**

10. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 10 of the Complaint and, therefore, denies the same, including all subparts.

11. RRI denies the allegations contained in paragraph 11 of Plaintiff's Complaint, including all subparts.

12. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 12 of the Complaint and, therefore, denies the same.

### **JURISDICTION AND VENUE**

13. The allegations contained in paragraph 13 constitute a legal conclusion to which no response from RRI is required. To the extent a response is required from RRI, RRI denies the allegations contained in paragraph 13 of Plaintiff's Complaint.

14. The allegations contained in paragraph 14 constitute a legal conclusion to which no response from RRI is required. To the extent a response is required from RRI, RRI denies the allegations contained in paragraph 14 of Plaintiff's Complaint.

15. RRI denies the allegations contained in paragraph 15 of Plaintiff's Complaint.

16. The allegations contained in paragraph 16 constitute a legal conclusion to which no response from RRI is required. To the extent a response is required from RRI, RRI denies the allegations contained in paragraph 16 of Plaintiff's Complaint.

## **SEX TRAFFICKING UNDER FEDERAL LAW**

17. The allegations contained in paragraph 17 constitute a legal conclusion to which no response from RRI is required. To the extent a response is required from RRI, RRI denies the allegations contained in paragraph 17 of Plaintiff's Complaint.

18. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 18 of the Complaint and, therefore, denies the same.

19. The allegations contained in paragraph 19 constitute a legal conclusion to which no response from RRI is required. To the extent a response is required from RRI, RRI denies the allegations contained in paragraph 19 of Plaintiff's Complaint.

20. RRI denies the allegations contained in paragraph 20 of Plaintiff's Complaint.

21. RRI denies the allegations contained in paragraph 21 of Plaintiff's Complaint.

22. RRI denies the allegations contained in paragraph 22 of Plaintiff's Complaint.

23. RRI denies the allegations contained in paragraph 23 of Plaintiff's Complaint.

24. The allegations contained in paragraph 24 constitute a legal conclusion to which no response from RRI is required. To the extent a response is required from RRI, RRI denies the allegations contained in paragraph 24 of Plaintiff's Complaint.

## **THE SEX TRAFFICKING OF PLAINTIFF L.G.**

25. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 25 of the Complaint and, therefore, denies the same.

26. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 26 of the Complaint and, therefore, denies the same.

27. RRI denies the allegations contained in paragraph 27 of Plaintiff's Complaint.

28. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 28 of the Complaint and, therefore, denies the same.

29. RRI denies the allegations contained in paragraph 29 of Plaintiff's Complaint.

30. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 30 of the Complaint and, therefore, denies the same.

31. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 31 of the Complaint and, therefore, denies the same.

32. RRI denies the allegations contained in paragraph 32 of Plaintiff's Complaint, including all subparts.

33. RRI denies the allegations contained in paragraph 33 of Plaintiff's Complaint.

34. RRI denies the allegations contained in paragraph 34 of Plaintiff's Complaint.

35. RRI denies the allegations contained in paragraph 35 of Plaintiff's Complaint.

36. RRI denies the allegations contained in paragraph 36 of Plaintiff's Complaint.

37. RRI denies the allegations contained in paragraph 37 of Plaintiff's Complaint, including all subparts.

38. RRI denies the allegations contained in paragraph 38 of Plaintiff's Complaint, including all subparts.

39. RRI denies the allegations contained in paragraph 39 of Plaintiff's Complaint.

40. RRI denies the allegations contained in paragraph 40 of Plaintiff's Complaint.

41. RRI denies the allegations contained in paragraph 41 of Plaintiff's Complaint.

42. RRI denies the allegations contained in paragraph 42 of Plaintiff's Complaint.

43. RRI denies the allegations contained in paragraph 43 of Plaintiff's Complaint.

44. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 44 of the Complaint and, therefore, denies the same.

**THE HOSPITALITY INDUSTRY'S PARTICIPATION  
IN THE SEX TRAFFICKING INDUSTRY**

45. The allegations contained in paragraph 45 of the Complaint are not directed at RRI. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 45 of the Complaint and, therefore, denies the same.

46. The allegations contained in paragraph 46 of the Complaint are not directed at RRI. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 46 of the Complaint and, therefore, denies the same.

47. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 47 of the Complaint and, therefore, denies the same.

48. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 48 of the Complaint and, therefore, denies the same.

49. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 49 of the Complaint and, therefore, denies the same.

50. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 50 of the Complaint and, therefore, denies the same.

51. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 51 of the Complaint and, therefore, denies the same.

52. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 52 of the Complaint and, therefore, denies the same.

53. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 53 of the Complaint and, therefore, denies the same.

54. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 54 of the Complaint and, therefore, denies the same.

55. The allegations contained in paragraph 55 of the Complaint are not directed at RRI. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 55 of the Complaint and, therefore, denies the same.

56. The allegations contained in paragraph 56 of the Complaint are not directed at RRI. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 56 of the Complaint and, therefore, denies the same.

57. The allegations contained in paragraph 57 of the Complaint are not directed at RRI. In further responding, RRI is without knowledge or information sufficient to form a belief

as to the truth of the allegations contained in paragraph 57 of the Complaint and, therefore, denies the same.

58. The allegations contained in paragraph 58 of the Complaint are not directed at RRI. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 58 of the Complaint and, therefore, denies the same.

59. The allegations contained in paragraph 59 of the Complaint are not directed at RRI. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 59 of the Complaint and, therefore, denies the same.

60. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 60 of the Complaint and, therefore, denies the same.

61. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 61 of the Complaint and, therefore, denies the same.

62. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 62 of the Complaint and, therefore, denies the same.

63. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 63 of the Complaint and, therefore, denies the same.

64. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 64 of the Complaint and, therefore, denies the same.

65. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 65 of the Complaint and, therefore, denies the same.

66. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 66 of the Complaint and, therefore, denies the same.

67. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 67 of the Complaint and, therefore, denies the same.

68. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 68 of the Complaint and, therefore, denies the same.

69. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 69 of the Complaint and, therefore, denies the same.

70. RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 70 of the Complaint and, therefore, denies the same.

71. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 71 of the Complaint and, therefore, denies the same.

72. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 72 of the Complaint and, therefore, denies the same.

73. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 73 of the Complaint and, therefore, denies the same.

74. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 74 of the Complaint and, therefore, denies the same.

75. RRI denies any sex trafficking occurred in its hotels. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 75 of the Complaint and, therefore, denies the same.

76. RRI denies the allegations contained in paragraph 76 of Plaintiff's Complaint.

77. RRI denies the allegations contained in paragraph 77 of Plaintiff's Complaint.

78. RRI denies the allegations contained in paragraph 78 of Plaintiff's Complaint.

#### **THE DEFENDANTS' CONTROL OVER THEIR HOTEL LOCATIONS**

79. The allegations contained in paragraph 79 of the Complaint are not directed at RRI. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 79 of the Complaint and, therefore, denies the same.

80. The allegations contained in paragraph 80 of the Complaint are not directed at RRI. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 80 of the Complaint and, therefore, denies the same.

81. The allegations contained in paragraph 81 of the Complaint are not directed at RRI. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 81 of the Complaint and, therefore, denies the same.

82. The allegations contained in paragraph 82 of the Complaint are not directed at RRI. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 82 of the Complaint and, therefore, denies the same.

83. The allegations contained in paragraph 83 of the Complaint are not directed at RRI. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 83 of the Complaint and, therefore, denies the same.

84. RRI denies the allegations contained in paragraph 84 of Plaintiff's Complaint.

85. The allegations contained in paragraph 85 of the Complaint are not directed at RRI. In further responding, RRI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 85 of the Complaint and, therefore, denies the same.

86. RRI denies the allegations contained in paragraph 86 of Plaintiff's Complaint.

87. RRI denies the allegations contained in paragraph 87 of Plaintiff's Complaint.

88. RRI denies the allegations contained in paragraph 88 of Plaintiff's Complaint.

89. RRI denies the allegations contained in paragraph 89 of Plaintiff's Complaint.

90. RRI denies the allegations contained in paragraph 90 of Plaintiff's Complaint.

91. RRI denies the allegations contained in paragraph 91 of Plaintiff's Complaint.

92. RRI denies the allegations contained in paragraph 92 of Plaintiff's Complaint.

93. RRI denies the allegations contained in paragraph 93 of Plaintiff's Complaint.

94. RRI denies the allegations contained in paragraph 94 of Plaintiff's Complaint.

95. RRI denies the allegations contained in paragraph 95 of Plaintiff's Complaint.

96. RRI denies the allegations contained in paragraph 96 of Plaintiff's Complaint.

**THE DEFENDANTS' ACTUAL AND CONSTRUCTIVE KNOWLEDGE OF SEX TRAFFICKING AT THEIR HOTELS**

97. RRI denies the allegations contained in paragraph 97 of Plaintiff's Complaint.

98. RRI denies the allegations contained in paragraph 98 of Plaintiff's Complaint.

99. RRI denies the allegations contained in paragraph 99 of Plaintiff's Complaint.
100. RRI denies the allegations contained in paragraph 100 of Plaintiff's Complaint.
101. RRI denies the allegations contained in paragraph 101 of Plaintiff's Complaint.
102. RRI denies the allegations contained in paragraph 102 of Plaintiff's Complaint.
103. RRI denies the allegations contained in paragraph 103 of Plaintiff's Complaint.
104. RRI denies the allegations contained in paragraph 104 of Plaintiff's Complaint.
105. RRI denies the allegations contained in paragraph 105 of Plaintiff's Complaint.
106. RRI denies the allegations contained in paragraph 106 of Plaintiff's Complaint.
107. RRI denies the allegations contained in paragraph 107 of Plaintiff's Complaint,

including all subparts.

108. RRI denies the allegations contained in paragraph 108 of Plaintiff's Complaint.
109. RRI denies the allegations contained in paragraph 109 of Plaintiff's Complaint.
110. RRI denies the allegations contained in paragraph 110 of Plaintiff's Complaint,

including all subparts.

111. RRI denies the allegations contained in paragraph 111 of Plaintiff's Complaint.
112. RRI denies the allegations contained in paragraph 112 of Plaintiff's Complaint.
113. RRI denies the allegations contained in paragraph 113 of Plaintiff's Complaint.
114. RRI denies the allegations contained in paragraph 114 of Plaintiff's Complaint.
115. RRI denies the allegations contained in paragraph 115 of Plaintiff's Complaint.
116. RRI denies the allegations contained in paragraph 116 of Plaintiff's Complaint.
117. RRI denies the allegations contained in paragraph 117 of Plaintiff's Complaint.
118. RRI denies the allegations contained in paragraph 118 of Plaintiff's Complaint.
119. RRI denies the allegations contained in paragraph 119 of Plaintiff's Complaint.

120. RRI denies the allegations contained in paragraph 120 of Plaintiff's Complaint.

121. RRI denies the allegations contained in paragraph 121 of Plaintiff's Complaint.

122. RRI denies the allegations contained in paragraph 122 of Plaintiff's Complaint.

123. RRI denies the allegations contained in paragraph 123 of Plaintiff's Complaint, including all subparts.

124. RRI denies the allegations contained in paragraph 124 of Plaintiff's Complaint.

125. RRI denies the allegations contained in paragraph 125 of Plaintiff's Complaint, including all subparts.

126. RRI denies the allegations contained in paragraph 126 of Plaintiff's Complaint, including all subparts.

127. RRI denies the allegations contained in paragraph 127 of Plaintiff's Complaint, including all subparts.

128. RRI denies the allegations contained in paragraph 128 of Plaintiff's Complaint.

129. RRI denies the allegations contained in paragraph 129 of Plaintiff's Complaint.

130. RRI denies the allegations contained in paragraph 130 of Plaintiff's Complaint.

**THE DEFENDANTS FACILITATED THE TRAFFICKING OF L.G.**

131. RRI denies the allegations contained in paragraph 131 of Plaintiff's Complaint.

132. RRI denies the allegations contained in paragraph 132 of Plaintiff's Complaint.

133. RRI denies the allegations contained in paragraph 133 of Plaintiff's Complaint.

134. RRI denies the allegations contained in paragraph 134 of Plaintiff's Complaint.

135. RRI denies the allegations contained in paragraph 135 of Plaintiff's Complaint, including all subparts.

136. RRI denies the allegations contained in paragraph 136 of Plaintiff's Complaint.

## **CAUSES OF ACTION**

### **COUNT I: 18 U.S.C. § 1595 (“TVPRA”) (AGAINST ALL DEFENDANTS)**

137. In response to the allegations contained in paragraph 137 of Plaintiff's Complaint, RRI incorporates its responses to the foregoing allegations as if fully re-stated herein.

138. The allegations contained in paragraph 138 constitute a legal conclusion to which no response from RRI is required. To the extent a response is required from RRI, RRI denies the allegations contained in paragraph 138 of Plaintiff's Complaint.

139. RRI denies the allegations contained in paragraph 139 of Plaintiff's Complaint.

140. RRI denies the allegations contained in paragraph 140 of Plaintiff's Complaint.

141. RRI denies the allegations contained in paragraph 141 of Plaintiff's Complaint.

142. RRI denies all allegations not specifically admitted herein.

## **AFFIRMATIVE DEFENSES**

### **FIRST DEFENSE**

143. Plaintiff's Complaint fails to state a claim against RRI upon which relief can be granted.

### **SECOND DEFENSE**

144. This Court lacks personal jurisdiction over RRI.

### **THIRD DEFENSE**

145. Venue is improper.

### **FOURTH DEFENSE**

146. This Court lacks subject matter jurisdiction over this matter.

### **FIFTH DEFENSE**

147. Plaintiff's claims are or may be barred by the applicable statute of limitations.

### **SIXTH DEFENSE**

148. Plaintiff's Complaint may be barred by the doctrine of res judicata and/or collateral estoppel.

### **SEVENTH DEFENSE**

149. Plaintiff's claims of damages or liability are barred in whole or in part by her own failure to mitigate such damages.

### **EIGHTH DEFENSE**

150. Plaintiff's claims are barred by a doctrine of estoppel, waiver, release, fraud, unclean hands and/or laches.

### **NINTH DEFENSE**

151. The losses, if any, sustained by the Plaintiff were the result of conduct of persons or entities over whom RRI has no control or responsibility, and for whose conduct RRI is thus not liable.

### **TENTH DEFENSE**

152. Plaintiff's claims against RRI are barred because there is no causal connection between any alleged act, error, or omission by RRI and the Plaintiff's alleged damages.

### **ELEVENTH DEFENSE**

153. Plaintiff has failed to join all necessary parties for just adjudication pursuant to Rule 19.

### **TWELFTH DEFENSE**

154. Plaintiff's alleged damages were caused by a superseding, intervening act, which was beyond the knowledge or control of RRI.

**THIRTEENTH DEFENSE**

155. RRI is entitled to apportionment of liability to other parties and non-parties to this action pursuant to Ohio Revised Code 2307.23.

**FOURTEENTH DEFENSE**

156. Plaintiff's claims are barred in whole or in part because of her own comparative negligence and/or assumption of risk.

**FIFTEENTH DEFENSE**

157. RRI respectfully reserves the right to amend its Answer to assert other affirmative defenses, claims, and defense as may become available or apparent during the course of discovery.

**SIXTEENTH DEFENSE**

158. There was a failure of process/failure of service of process.

**REQUESTS FOR RELIEF**

WHEREFORE, Red Roof Inns, Inc. respectfully requests a Judgment in its favor as follows:

- A. For a trial by jury;
- B. Dismissal of Plaintiff's Complaint;
- C. Awarding attorneys' fees and costs taxed against Defendant as allowable by law; and
- D. For such other and further relief as this Court may deem just and appropriate.

Respectfully submitted,

/s/ Katherine L. Kennedy

Katherine L. Kennedy (0079566)

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*Attorneys for Defendants, Red Roof Inns, Inc.  
and Red Roof Franchising, LLC*

### **JURY DEMAND**

A trial composed of the maximum number of jurors is hereby requested.

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of July, 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notice of such filing to all attorneys of record.

/s/ Katherine L. Kennedy

Katherine L. Kennedy